



August 21, 2014

Dr. Earnest Moniz, Secretary of Energy
U.S. Department of Energy
Office of Energy Policy and Systems Analysis, EPSA-60
1000 Independence Avenue SW
Washington, DC 20585-0121

Re: QER Meeting Comments, Meeting held August 21, 2014 in Cheyenne, WY

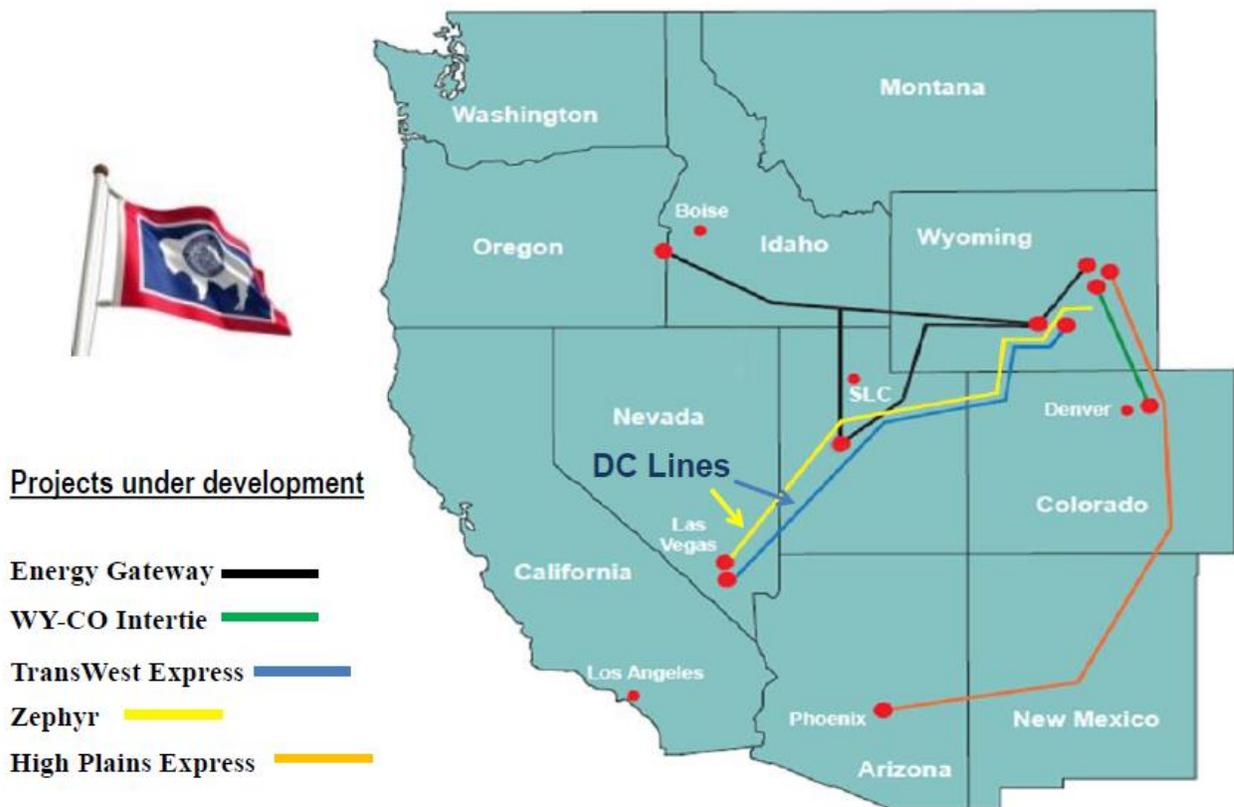
Mr. Secretary:

The Wyoming Infrastructure Authority (WIA) was created by the State Legislature in 2004 to *“diversify and expand the state’s economy by adding value to Wyoming’s energy resources and infrastructure for the benefit of Wyoming and the region.”* Consistent with this Legislative charge, and as an instrumentality of the State of Wyoming, the WIA has been following the federal permitting progress and supporting the development plans of a number of interstate transmission projects originating in Wyoming involving federal, state and private lands. Such projects and the permitting status of each are as follows:

- 1) Gateway West (GWW), 1,500 MW single-circuit 500 kV AC line: a Final Environmental Impact Statement (EIS) was published by the Bureau of Land Management (BLM) in April 2013 and a Record of Decision (ROD) was issued on Nov 14, 2013.
- 2) Gateway South (GWS), 1,500 MW single-circuit 500 kV AC line: a Draft Environmental Impact Statement (DEIS) was published by the BLM on February 21, 2014.
- 3) TransWest Express (TWE), 3,000 MW 600 kV DC line: a Draft Environmental Impact Statement (DEIS) was published by the BLM and Western Area Power Administration (Western) in June 2013 and a final EIS and ROD should occur in late 2014.

- 4) Zephyr, 3,000 MW double-circuit 500 kV DC line: remains in the pre-NEPA stage.
- 5) Wyoming-Colorado Intertie (WCI), 750 MW 345 kV AC line: Development work is continuing.
- 6) High Plains Express (HPX), 3,500 MW double-circuit 500kV AC line: remains in the pre-NEPA stage.

A map depicting the planned routes for each of these projects is as follows:



Issues relative to permitting and siting of infrastructure in the form of transmission lines and pipelines and the cost and timing of such have been a topic for discussion and analysis for well over a decade.

In 2002, 12 Western governors, including all of the major states in the Western Interconnection, and four federal agencies (DOE, DOI, USDA, CEQ) signed the [WGA Transmission Permitting Protocol](#) that provided for collaborative permitting agency interstate transmission proposals.

On October 5, 2011: Federal officials ([Rapid Response Team for Transmission--RRTT](#)) announced that seven (7) transmission projects across the U.S. had been selected for accelerated permitting and siting. Wyoming was fortunate to have two (2) of those projects named---the TransWest Express and the Energy Gateway West Power Transmission Projects.

The Western Governors Association (WGA) has formed a Transmission Siting Panel made up of a number of western states, Wyoming included. The Panel has identified a pre-NEPA application process that has the ability of resulting in a more timely permitting process; however, much work remains to be done.

In an effort to identify permitting steps which can possibly be improved upon, the WIA commissioned Tetra Tech to produce two roadmaps detailing the permitting process in 2012 as follows:

- 1) [Mapping the Permitting & Siting of Transmission Development in Wyoming](#)
- 2) [Mapping the Permitting & Siting of Wind Development in Wyoming](#)

Since the roadmaps have been completed, a number of states on the WGA Siting Panel have commissioned similar documents in an effort to streamline the permitting process, including Utah.

In spite of these efforts, the permitting and siting of transmission lines across federal lands continues to result in inordinate amounts of time and expense. Some examples of such include the following:

- 1) Gateway West Project: the final EIS and ROD have been achieved; however, such permitting milestones took over six years to attain even though the project was a RRTT expedited endeavor.
- 2) TransWest Express Project: while the EIS and ROD have yet to be published, the permitting effort relative to this RRTT-named project will take over six years as well.

If allowed to identify only one issue that remains unresolved relative to the permitting of power transmission lines, the WIA would quickly point to the continuing lack of coordination and collaboration between BLM field offices. This issue has been addressed on numerous occasions over the last decade and continues to represent a perpetual unresolved impediment to completion of transmission permitting in a timely and efficient manner.

Mr. Brian Jeffries, Executive Director, Wyoming Pipeline Authority served on the ***Oil and Gas Infrastructure: Federal, State and Local Permitting and Siting Issues Panel*** today and you have heard him share some of the issues relative to the BLM field offices over the last 18 to 24 months which are in concert with the WIA's view.

The U.S. has an aging transmission infrastructure and there is a need for new transmission like the projects being developed in Wyoming to deliver cost-effective power to ratepayers in states like California. There have been two independent studies since 2011 that show California ratepayers can save up to \$1 billion annually in power costs for renewable energy relative to Wyoming's world class wind resources. Those studies are:

- 1) [The 2011 WECC 10-Year Regional Transmission Plan](#); and
- 2) [The 2013 NREL California/Wyoming Grid Integration Study](#)

The WIA thanks the Secretary for scheduling the QER meeting in Cheyenne and would appreciate the DOE's assistance and support in resolving the issues relative to the transmission and siting permitting process to the benefit of all.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. Drain", enclosed in a thin black rectangular border.

Loyd G. Drain
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